

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JEFFREY SIEGEL, Administrator of the
Estate of MOUSTAPHA AKKAD,
Deceased, SOOHA AKKAD, individually;
SUSAN GITELSON, Special Administrator
of the Estate of RIMA AKKAD MONLA,
deceased; and MICHAEL BUTLER,

Plaintiffs,

v.

H GROUP HOLDING, INC., a corporation;
GLOBAL HYATT CORPORATION, a
corporation; HYATT INTERNATIONAL
CORPORATION, a corporation;
HYATT CORPORATION, a corporation;
HYATT HOTELS CORPORATION, a
corporation; HYATT INTERNATIONAL
(EUROPE AFRICA MIDDLE EAST) LLC;
AIC HOLDING CO., a corporation;
HYATT INTERNATIONAL HOLDINGS,
CO., a corporation; HI HOLDINGS
LUXEMBUG S.a.r.l.; ZARA
INVESTMENT HOLDING CO.; and
AMMAN TOURISM INVESTMENT CO.,
LTD.,

Defendants.

No. 07 C 6830

Judge John W. Darrah

Magistrate Susan E. Cox

UNOPPOSED MOTION FOR EXTENSION OF TIME

Defendants Global Hyatt Corporation (“Global Hyatt”), Hyatt International (“Hyatt International”) Corporation, and Hyatt International (Europe Middle East Africa) LLC (“Hyatt EAME”) (collectively, “Defendants”), through their attorneys, Wildman, Harrold, Allen & Dixon, respectfully move for an extension of time of 21 days in which to file their motion to dismiss, and in support thereof, state as follows:

1. Defendants’ motion to dismiss is presently due on Monday, December 24, 2007.

2. One of the grounds upon which Defendants are moving for dismissal is *forum non conveniens*, inasmuch as the underlying incident, a terrorist bombing, took place in Amman, Jordan, and involved plaintiffs residing in the Middle East.

3. One of the requisites for moving to dismiss under *forum non conveniens*, is demonstrating that an alternate adequate forum exists. Towards that end, the undersigned counsel has spoken with a Jordanian attorney knowledgeable in the causes of action available to the plaintiffs in Jordan. As part of finalizing the motion to dismiss, the undersigned counsel prepared an affidavit for the Jordanian attorney's signature.

4. Unfortunately, the undersigned has been unable to make contact with the Jordanian attorney to finalize and execute the affidavit, despite diligent efforts. To the best of the undersigned's knowledge and belief, he is unable to make contact with the Jordanian lawyer because the Muslim holidays of Hajj and Eid al-Adha, which are based on the lunar calendar, are underway. The undersigned believes the Jordanian attorney is observing those holidays, and therefore unable to respond to the undersigned's attempts to make contact.

5. The undersigned does not expect to be able to make contact with the Jordanian attorney until early January, 2008. The undersigned therefore asks for an extension of time to January 14 in which to file Defendants' motion to dismiss.

6. Plaintiffs' counsel has no objection to this motion.

WHEREFORE, Defendants respectfully request an additional twenty-one (21) days, or until January 14, 2008, to file their motion to dismiss.

Respectfully submitted,

By: /s/ Mark P. Miller

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ATTESTATION OF MARK P. MILLER

Mark P. Miller, under penalty of perjury, affirms and states that the assertions of fact made in the foregoing motion are true and correct to the best of his knowledge and belief.

/s/ Mark P. Miller



CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that he caused a copy of the foregoing to be served upon all counsel of record by ECF on December 21, 2007.

/s/ Mark P. Miller